

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

**GAIL MINK, ET AL.,**

**PLAINTIFFS**

**v.**

**BALTIMORE BEHAVIORAL  
HEALTH INC., ET AL.,**

**DEFENDANTS**

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**Civil Action Number: WDQ-11-01937**

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**AFFIDAVIT OF BRADLEY A. BENNER**

I, Bradley A. Benner of The Lincoln National Life Insurance Company, hereby declare  
and state the following:

1. Lincoln National Life Insurance Company was the record keeper for the  
Baltimore Behavioral Health Retirement Plan from January 2007 through  
December 2011.
2. I am employed by The Lincoln National Life Insurance Company and my title is  
Technical Consultant. I have personal knowledge of the record keeping system of  
The Lincoln National Life Insurance Company.
3. The attached pages of documents are true and correct copies of records taken  
from the files of The Lincoln National Life Insurance Company.

4. Pursuant to a subpoena issued by attorneys Lebau&Neuworth we produced the requested business records including all contributions made by Baltimore Behavioral Health Retirement Plan from January 2007 through December 2011.
5. These records were kept in the regular course of business.
6. It is the regular course of our business to keep these records.
7. We produced documents from January 2007 through December of 2011 for the Baltimore Behavioral Health Retirement Plan in the above captioned case.
8. Our records reflect that no contributions were made after September 25, 2009 except for two contributions that were received on August 4, 2010. These two contributions however were applied to the September 11, 2009 and September 25, 2009 payroll end dates.

Bradley A. Bern

Sworn to and subscribed before me this 29<sup>th</sup> day of March 2012.

Notary Public

My commission Expires

SHAWN M. GROSS, Notary Public

Resident of Allen County, Indiana

My Commission Expires January 31, 2016

Shawn M. Gross